

**WESTERMAN BALL EDERER
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April 7, 2025

VIA ECF

MEMO ENDORSED

Hon. Edgardo Ramos
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square, Courtroom 619
New York, New York 10007

Re: Wells Fargo Bank v. 3708 Vestal Pkwy E., LLC, et al.
Civil Action No.: 1:22-cv-04714-ER

Dear Judge Ramos:

This firm represents defendants 3708 Vestal Pkwy E., LLC (“3708 Vestal”), Olga J. Tsunis and George Tsunis (collectively, “Defendants”) in the above-referenced action. We write jointly with plaintiff to request an adjournment of the Case Management Conference scheduled for April 10, 2025. The reason for the request is that the parties continue to be engaged in settlement discussions and seek additional time to try to resolve this matter without the need for further litigation. It is respectfully requested that the Court adjourn the conference for approximately 60 days to afford the parties ample time to try to finalize a resolution.

Both parties consent to the adjournment. There has been one prior request for an adjournment of this conference and the parties have made significant progress since that request.

We thank the Court for its time and attention to this matter, and for its consideration of this request.

Defendants' request to adjourn the case management conference from April 10, 2025, to June 12, 2025, at 11 am, is granted.

SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: April 8, 2025
New York, New York

Respectfully,

WESTERMAN BALL EDERER
MILLER ZUCKER & SHARFSTEIN, LLP

By: /s/ Todd M. Gardella
Todd M. Gardella

cc: All counsel of record (via ECF)